

REMARKS

Claims 49-82 are presently pending in this application. The Examiner rejected claims 49-82. By this Response, claims have been amended and new claims 83-85 are added. The amendment made to the claims and the newly added claims are fully supported by the specification as originally filed. No new matter has been introduced. Reconsideration of this application for allowance of all pending claims are hereby respectfully requested in view of the following remarks.

Rejection Under 35 U.S.C. § 112

Claims 52, 75-78 and 80-82 have been rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Applicants respectfully traverse the rejection.

With regard to claim 52, the Examiner indicated that support for claim limitation “translation list”, as recited in claim 52, is not found in the specification as filed. First, the Applicants respectfully point out that the concept of a “translation queue” corresponds to or is equivalent of a “translation list”. Second, in paragraphs 47, 141-143, and 158-159 of the specification, the concept of “translation queue” is explicitly disclosed. The description in the cited portions of the specification provides adequate support for claim limitation “translation list” and, therefore, satisfies the statutory written description requirement with respect to the claim limitations the Examiner rejected. Accordingly, the Applicants respectfully request that the Examiner’s rejection of claim 52 under 35 U.S.C. § 112, first paragraph be withdrawn.

With regard to claims 75-77, the Examiner indicated that support for claim limitations “tracking information” (claims 75, 76, 77), “session information” (claim 76), and “cookie” (77), is not found in the specification as filed. The Applicants respectfully point out that “tracking

information” corresponds to or is equivalent of “session information”, which is specifically disclosed in paragraphs 148 and 180 of the specification. Similarly, “state information” corresponds to or is equivalent of “cookie”, which is disclosed in paragraph 180 of the specification. Either the term “cookie” or the term “session ID parameters” can be characterized as “session information”. Support for both “cookie” and “session ID parameters” can be found in paragraph 180 of the specification. Information disclosed in these paragraphs provides adequate support for the claim limitations of “tracking information”, “state information”, “session information”, and “cookie”. Thus, the instant application satisfies the statutory written description requirement with respect to the claim limitations the Examiner rejected. Accordingly, the Applicants respectfully request that the Examiner’s rejection of claim 75-77 under 35 U.S.C. §112, first paragraph be withdrawn.

With regard to claim 78, the Examiner indicated that support for claim limitation “HTML form” is not found in the specification as filed. The Examiner is directed to paragraph 180 of the specification, which states “spider 404 can further fill out and submit **forms** with pre-defined information”. It is known that a “spider” is a mechanism operating in the Internet arena and deals with electronic information. The specification of the instant application discloses that a spider is capable of filling out a form based pre-defined information. Without any disclaimer or prejudice, the Applicants amended claim 78 for clarity. The specification adequately supports the amended claim 78 and, hence, satisfies the statutory written description requirement with respect to this claim limitation. Therefore, the Applicants respectfully request that the Examiner’s rejection of claim 52 under 35 U.S.C. §112, first paragraph be withdrawn.

With regard to claims 80-82, the Examiner indicated that support for claim limitation “generating statistics for the image file” is not found in the specification as filed. First, the

Applicants respectfully point out that an image file containing text to be translated constitutes a translatable component according to the teachings of the instant application. See paragraph 175. In addition, the support for “generating statistics for the image file” is found in paragraph 177, which states “spider 404 generates statistics based on the translatable components”. The quoted portion of the specification adequately supports that statistics can be generated for the image file, as recited in the claim 80-82 and, hence, satisfies the statutory written description requirement. Therefore, the Applicants respectfully request that the Examiner’s rejection of claim 80-82 under 35 U.S.C. §112, first paragraph be withdrawn.

Rejection Under 35 U.S.C. § 101

Claims 61-69 have been rejected for lacking the necessary physical articles or objects to constitute a machine or a manufacture within the meaning of 35 U.S.C. § 101. By this response, the Applicants amended claims 61, 62, 64, and 68 for clarification without disclaimer or prejudice. The amended claims 61, 62, 64, and 68 are directed to a system that comprises a plurality of articles or units, satisfying as a system within the meaning of 35 U.S.C. § 101. Therefore, the amended claims 61-69 are patentable. The Applicants respectfully request that the rejection of claims 61-69 be withdrawn. Claims 63, 65, 66, 67, and 69 recite further limitations with respect to their dependent claims, claims 63, 65, 66, 67, and 69 are patentable under 35 U.S.C. § 101 for at least the same reasons as stated above with respect to their dependent claims and for the additional features recited there.

Rejection Under 35 U.S.C. § 102(e)

In Section 19 of the Office Action, the Examiner rejected claims 49-82 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,526,426, issues to Lakritz (hereafter Lakritz). The Applicants respectfully traverse.

Independent claims 49, 60, 61, 70, 74, 83, 84, and 85 recite “accessing content in a first language, including ... content retrieved by following a link contained in web content or content having markup tags”. The Applicants respectfully submit that Lakritz does not teach this claimed feature. Lakritz teaches a translation management and process control system (see Abstract, Column 3, line 16) that accesses content stored in a database and does not access content by following a link contained in web content or content having markup tags, as recited in independent claims 49, 60, 61, 70, 74, 83, 84, and 85.

In addition, independent claims 49, 60, 61, 70, 74, 83, 84, and 85 recite “generating statistics based on the one or more translatable components”. The Examiner asserts that Lakritz discloses this claimed feature and cites Lakritz “The UsageLog contains a summary of country and language statistics” (Col. 15, lines 47-48). The Applicants respectfully submit that the “language statistics”, as disclosed in Lakritz, is not “statistics based on one or more translatable components”, as recited in claims 49, 60, 61, 70, 74, 83, 84, and 85.

Lakritz teaches a translation management and process control system (see Abstract, Column 3, line 16) not a system for language translation. Lakritz facilitates various aspects of managing web information access in different languages, including monitoring user activities using a log, which records online viewing activities of translated pages. For example, the log records which web document is viewed by users from which countries, how many times (hits),

and/or in what language the online users reviewed the web document. Lakritz teaches “The InformationLog contains detailed information about WebPlexer’s language selection processing for each request.” See Col. 15, lines 28-29, “The UsageLog contains a summary of country and language statistics. It is generated from the InformationLog using the usage log analysis tool.” See Col. 15, lines 48-49. The “language statistics”, as taught by Lakritz, characterize viewing behavior of online users and are not related to individual “translatable components” parsed from content, as recited in claims the independent claims. That is, Lakritz fails to disclose the claim limitation “statistics based on one or more translatable components”.

Furthermore, independent claims 83, 84, and 85 recite “wherein the statistics are used to measure the size the content for language translation”. The Applicants respectfully submit that Lakritz does not teach this claimed feature. The Examiner cited Col. 35, lines 37-56 of Lakritz and asserts that what Lakritz described in “<INPUT TYPE='text' NAME='phone' SIZE=40 VALUE=''>” evidences Lakritz’s teaching that statistics are used to size the content for language translation. The Applicants respectfully submit that this reasoning is not correct. First, what is cited in Lakritz’s relating to “size” refers to the size of a window through which a user may enter information. Second, the feature “size” in Lakritz, as cited by the Examiner, has no relationship with the term “language statistics” cited by the Examiner and therefore does not meet the limitation “wherein the statistics are used to measure the size the content”, as recited in claims 83, 84, and 85.

It is well-settled that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Since Lakritz fails to disclose and teach at least two claim elements recited in

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independent claims 49, 60, 61, 70, 74, 83, 84, and 85, the Applicants respectfully submit that Lakritz does not anticipate claims 49, 60, 61, 70, 74, 83, 84, and 85. Thus, claims 49, 60, 61, 70, 74, 83, 84, and 85 are patentable.


Since independent claims 49, 60, 61, 70, 74, 83, 84, and 85 are patentable for the reasons discussed above, claims that depend from these independent claims are also patentable for at least the same reasons stated above with respect to their respective independent claims and for the additional features recited therein.

Accordingly, it is believed that all pending claims are now in condition for allowance. Applicant therefore respectfully requests an early and favorable reconsideration and allowance of this application. If there are any outstanding issues which might be resolved by an interview or an Examiner's amendment, the Examiner is invited to call Applicant's representative at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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